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 Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Victor F. Sanchez,
 Plaintiff,
 v.

KILOLO KIJAKAZI,
 Acting Commissioner of Social Security,
 Defendant.

)
) Case No. 2:22-cv-00936-VCF
)

**UNOPPOSED MOTION FOR
 EXTENSION OF TIME
 (FIRST REQUEST)**

Defendant Kilolo Kijakazi, Acting Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and/or Remand (Dkt. No. 21), currently due on October 11, 2022, by 43 days, through and including November 21, 2022. Defendant further requests that all subsequent deadlines set forth in the Court's scheduling order (Dkt. No. 18) be extended accordingly.

This is Defendant's first request for an extension of time. Defendant's counsel has not previously requested an extension of time for this deadline. Good cause exists for this extension due to a combination of Defendant's counsel's workload and annual leave as described below. Since Plaintiff filed his brief on September 9, 2022, the undersigned attorney for the Commissioner (of counsel, Julie

1 A.K. Cummings) has worked on 22 cases, including this one, and will have 9 briefs and 2 hearings due
 2 in district court cases over the next month and a half, as well as 3 non-program litigation matters.
 3 Compounding matters, the undersigned will be out of the office for one-and-a-half weeks of that time
 4 due to previously scheduled annual leave. Due to the overall workload within Office 7 of the Office of
 5 Program Litigation, which is responsible for the instant case, neither the undersigned attorney for the
 6 Commissioner nor another attorney will be able to complete briefing by the current due date.
 7 Additional time is required to review the record, to evaluate the numerous issues raised in Plaintiff's
 8 motion, to determine whether options exist for settlement, and if not, to prepare Defendant's response
 9 to Plaintiff's motion. Defendant's counsel will endeavor to complete these tasks as soon as possible.
 10 This request is made in good faith and with no intention to unduly delay the proceedings, and counsel
 11 apologizes for any inconvenience.

12 On October 6, 2022, counsel for Defendant conferred with Plaintiff's attorney, Marc V.
 13 Kalagian, who has no opposition to this motion.

14 It is therefore respectfully requested that Defendant be granted an extension of time to respond
 15 to Plaintiff's Motion for Reversal and Remand, through and including November 21, 2022.

16
 17 Dated: October 6, 2022

Respectfully submitted,

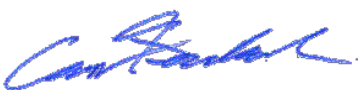
18 JASON M. FRIERSON
 19 United States Attorney

20 /s/ Margaret Lehrkind
 21 MARGARET LEHRKIND
 Special Assistant United States Attorney

22 OF COUNSEL:

23 Julie A.K. Cummings
 24 Assistant Regional Counsel
 Office of Program Litigation, Office 7
 25 Social Security Administration

IT IS SO ORDERED.



Cam Ferenbach
 United States Magistrate Judge

DATED 10-7-2022

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear St. Ste. 800, San Francisco, CA 94105. I am not a party to the above-entitled action. On the date set forth below, I caused a copy of the above **UNOPPOSED MOTION FOR EXTENSION OF TIME (*FIRST REQUEST*)** to be served upon the following by:

CM/ECF:

Leonard Stone
lstone@shookandstone.com

Marc V Kalagian
marc.kalagian@rksslaw.com

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 6, 2022

/s/ Margaret Lehrkind
MARGARET LEHRKIND
Special Assistant United States Attorney